

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>V.</b>	)	<b>CASE NO: 2:06-cr-60-WKW</b>
	)	
<b>DONALD FORREST MOORE, JR.</b>	)	

**UNOPPOSED MOTION TO CONTINUE TRIAL**

**COMES NOW** the Defendant by and through undersigned counsel, and respectfully moves the Court to continue the trial in this matter, now scheduled for June 2006, to a later date on a trial term in October 2006.

In support of this request, the Defendant would show:

1. This case will likely be resolved without a trial.
2. The defendant has a number of charges pending in other jurisdictions, and additional time will be necessary to investigate whether or not a global settlement is possible.
3. Counsel for the Government has no opposition to this requested continuance.
4. A Speedy Trial Waiver has been signed and will be filed with this court in support of this Motion.
5. Mr. Moore is presently in custody on a writ from the State of Alabama.

**WHEREFORE**, the defendant respectfully prays that this Motion be granted

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
Attorney for Donald F. Moore, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: K. David Cook, Esquire, Assistant United States Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104

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**s/Christine A. Freeman**

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